

APPENDIX A

Specific Program Elements

Post Construction/Permanent BMP
Program Element 1

Consent Decree Requirement: Complete evaluation of Post Construction/Permanent BMP programs for all three HDOT divisions three months after contract notice to proceed.

1. Post Construction/Permanent BMP Program Requirements:
 - a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv)(D)
 - b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.23(b)(5)
 - c. Hawaii Administrative Rules, 11-55, Appendix K (Small MS4) 6(a)(5)
2. Guidance Documents
 - a. Post-Construction Stormwater Management in New Development & Redevelopment webpage, [<http://www.epa.gov/npdes/stormwater/menuofbmps/postconstruction>]
 - b. Chapter 4.5 Post-Construction Controls, MS4 Program Evaluation Guidance
3. Post Construction/Permanent BMP Program Audit Specific Tasks
 - a. Develop Key Task and Event Schedule for Post Construction/Permanent BMP Program Scheduled as appropriate:
 - Permanent post-construction BMPs
 - Key design and construction personnel
 - b. Develop Post Construction/Permanent BMP Records Request.
 - c. Conduct meetings and onsite visits per Audit Work Plan, Section 3.
 - d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing Post Construction/Permanent BMP program evaluation.
 - e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing the Post Construction/Permanent BMP program evaluation for each permit.
 - f. HDOT to provide corrections or clarification request to draft Audit Report.
 - g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing the Post Construction/Permanent BMP program evaluation for each permit to DOT Project Manager.
 - h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before onsite	
2	Send records request to MS4 PC	LA, HDOT PM	1 month before onsite	
3	Conduct meetings and onsite visits NOTE: Below is a suggested schedule for one example permit			
	Opening briefing	LA	Allotment: 0.5 day	
	Meeting design and construction personnel			
	Onsite visit permanent BMP Highway Oahu		Allotment: 0.5 day	
	[Schedule for other permits TBD]			
4	Complete Post Construction/Permanent BMP Program audit			
	a. Honolulu/Kalaehoa Harbor Small MS4 Permit	LA	3 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Post Construction/Permanent BMP Program			
	Honolulu/Kalaehoa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaehoa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed

Construction Site Runoff Control
Program Element 2

Consent Decree Requirement: Complete evaluation of MS4 Construction Site Runoff Control program for all three HDOT divisions nine months after contract notice to proceed.

1. Construction Site Runoff Control Program Requirements:
 - a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv)(D)
 - b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.34(b)(4)
 - c. Hawaii Administrative Rules, 11-55, Appendix K (Small MS4) 6(a)(4)
2. Guidance Documents
 - a. Construction Site Stormwater Runoff Control webpage,
[<http://www.epa.gov/npdes/stormwater/menuofbmps/construction>]
 - b. Chapter 4.4 Construction Activities, MS4 Program Evaluation Guidance
3. Construction Site Runoff Control Program Audit Specific Tasks
 - a. Develop Key Task and Event Schedule for Construction Site Runoff Control Program Scheduled as appropriate:
 - Active construction site within MS4 area or boundary
 - Key construction personnel
 - b. Develop Construction Site Runoff Control Records Request.
 - c. Conduct meetings and onsite visits per Audit Work Plan, Section 3.
 - d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing Construction Site Runoff Control program audit.
 - e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing the Construction Site Runoff Control program evaluation for each permit.
 - f. HDOT to provide corrections or clarification request to draft Audit Report.
 - g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing the Construction Site Runoff Control program evaluation to DOT Project Manager.
 - h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before onsite	
2	Send Records Request to MS4 PC	LA, HDOT PM	1 month before onsite	
3	Conduct meetings and onsite audits NOTE: Below is a suggested schedule for one example permit			
	Opening briefing Highway Oahu District	LA	Allotment: 0.5 day	
	Meeting construction personnel			
	Onsite visit construction project Highway Oahu		Allotment: 0.5 day	
	[Schedule for other permits TBD]			
4	Complete Construction Site Runoff Control Program audit			
	a. Honolulu/Kalaehoa Harbor Small MS4 Permit	LA	9 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Construction Site Runoff Control Program			
	Honolulu/Kalaehoa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaehoa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed

Public Outreach/Public Involvement
Program Element 3

Consent Decree Requirement: Complete evaluation of Public Outreach/Public Involvement program for all three HDOT divisions fifteen months after contract notice to proceed.

1. Public Outreach/Public Involvement Program Requirements:
 - a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv)(B); 40 CFR 122.26(d)(2)(iv)(D)(4); 40 CFR 122.26(d)(2)(iv)(A)(6); 40 CFR 122.26(d)(2)(iv)(D)
 - b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.34(b)(1); 40 CFR 122.34(b)(2)
 - c. Hawaii Administrative Rules, 11-55, Appendix K (Small MS4) 6(a)(1); 11-55, Appendix K 6(a)(2)
2. Guidance Documents
 - a. Public Education and Outreach on Stormwater Impacts webpage, [<http://www.epa.gov/npdes/stormwater/menuofbmps/publiceducation>]
 - b. Public Involvement/Participation webpage, [<http://www.epa.gov/npdes/stormwater/menuofbmps/publicinvolvement>]
 - c. Chapter 4.2 Public Education and Participation, MS4 Program Evaluation Guidance
3. Public Outreach/Public Involvement Audit Specific Tasks
 - a. Develop Key Task and Event Schedule for Public Outreach/Public Involvement Program
 - b. Develop Public Outreach/Public Involvement Records Request.
 - c. Conduct meetings and visits per Audit Work Plan, Section 3.
 - d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing the Public Outreach/Public Involvement program audit.
 - e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing the Public Outreach/Public Involvement program evaluation for each permit.
 - f. HDOT to provide corrections or clarification request to draft Audit Report.
 - g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing the Public Outreach/Public Involvement program evaluation to DOT Project Manager.
 - h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before briefing	
2	Send Records Request to MS4 PC	LA, HDOT PM	1 month before briefing	
3	Conduct meetings and onsite visits NOTE: Below is a suggested schedule for one example permit			
	Opening briefing Honolulu International Airport	LA	Allotment: 0.5 day	
	Meeting MS4 PC			
	[Schedule for other permits TBD]			
4	Complete Public Outreach/Public Involvement Program audit			
	a. Honolulu/Kalaehoa Harbor Small MS4 Permit	LA	15 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Public Outreach/Public Involvement Program			
	Honolulu/Kalaehoa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaehoa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed

Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant
Program Element 4

Consent Decree Requirement: Complete evaluation of Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant program for all three HDOT divisions twenty-one months after contract notice to proceed.

1. Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Requirements:
 - a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv)(B); 40 CFR 122.26(d)(2)(iv)(C); 40 CFR 122.26(d)(2)(i)(A); 40 CFR 122.26(d)(2)(ii)
 - b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.34(b)(3); 40 CFR 122.34(b)(ii)
 - c. Hawaii Administrative Rules, 11-55, Appendix K (Small MS4) 6(a)(3)
2. Guidance Documents
 - a. Illicit Discharge Detection and Elimination webpage, [<http://www.epa.gov/npdes/stormwater/menuofbmps/illicitdischarge>]
 - b. Chapter 4.6 Industrial/Commercial Facilities, MS4 Program Evaluation Guidance
 - c. Chapter 4.7 Illicit Discharge Detection and Elimination, MS4 Program Evaluation Guidance
3. Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Audit Specific Tasks
 - a. Develop Key Task and Event Schedule for Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Program
Consider scheduling:
 - Drive by selected commercial facilities (or tenants)
 - b. Develop Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Records Request.
 - c. Conduct meetings and onsite visits per Audit Work Plan, Section 3.
 - d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing audit of Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant program.
 - e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing the Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant program evaluation for each permit.
 - f. HDOT to provide corrections or clarification request to draft Audit Report.
 - g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing the Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant program evaluation for each permit to DOT Project Manager.
 - h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before onsite	
2	Send Records Request to MS4 PC	LA, HDOT PM	1 month before onsite	
3	Conduct meetings and onsite visits NOTE: Below is a suggested schedule for one example permit			
	Opening briefing Honolulu International Airport	LA	Allotment: 0.5 day	
	MS4 PC – review records			
	Drive by selected tenants		Allotment: 2 hrs	
	[Schedule for other permits TBD]			
4	Complete Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Program audit			
	a. Honolulu/Kalaeloa Harbor Small MS4 Permit	LA	21 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Illicit Discharge Detection and Elimination, Industrial Commercial Activities/Tenant Program			
	Honolulu/Kalaeloa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaeloa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed

Pollution Prevention/Good Housekeeping
Program Element 5

Consent Decree Requirement: Complete evaluation of Pollution Prevention/Good Housekeeping program for all three HDOT divisions twenty-seven after contract notice to proceed.

1. Pollution Prevention/Good Housekeeping Requirements:

- a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv)(A)
- b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.34(b)(6)(i)
- c. Hawaii Administrative Rules, 11-55, Appendix K (Small MS4) 6(a)(6)

2. Guidance Documents

- a. Pollution Prevention/Good Housekeeping for Municipal Operators webpage, [<http://www.epa.gov/npdes/stormwater/menuofbmps/goodhousekeeping>]
- b. Chapter 4.3 MS4 Maintenance Activities, MS4 Program Evaluation Guidance

3. Pollution Prevention/Good Housekeeping Audit Specific Tasks

- a. Develop Key Task and Event Schedule for Pollution Prevention/Good Housekeeping Program
Consider scheduling:
 - Tracking software demonstration
 - Selected area inlets, drains and BMPs
- b. Develop Pollution Prevention/Good Housekeeping Records Request.
- c. Conduct meetings and onsite visits per Audit Work Plan, Section 3.
- d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing audit of the Pollution Prevention/Good Housekeeping program.
- e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing the Pollution Prevention/Good Housekeeping program evaluation for each permit.
- f. HDOT to provide corrections or clarification request to draft Audit Report.
- g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing the Pollution Prevention/Good Housekeeping program evaluation for each permit to DOT Project Manager.
- h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before onsite	
2	Send Records Request to MS4 PC	LA, HDOT PM	1 month before onsite	
3	Conduct meetings and onsite visits NOTE: Below is a suggested schedule for one example permit			
	Opening briefing Honolulu Harbor	LA	Allotment: 0.5 day	
	Meeting with MS4 PC review records			
	Visit select piers		Allotment: 2 hrs	
	[Schedule for other permits TBD]			
4	Complete Pollution Prevention/Good Housekeeping Program audit			
	a. Honolulu/Kalaehoa Harbor Small MS4 Permit	LA	27 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Pollution Prevention/Good Housekeeping Program			
	Honolulu/Kalaehoa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaehoa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed

Staffing, Funding, Organizational Structure, Availability of Resources
and Storm Water Program Sustainability
Program Element 6

Consent Decree Requirement: Complete evaluation of Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability for all three HDOT divisions thirty-three months after contract notice to proceed.

1. Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability Requirements:
 - a. Phase I MS4 Regulations (Large MS4) 40 CFR 122.26(d)(2)(iv); 40 CFR 122.42(c)
 - b. Phase II MS4 Regulations (Small MS4) 40 CFR 122.34(a); 40 CFR 122.34(d); 40 CFR 122.34(g)(1); 40 CFR 122.34(g)(3); 40 CFR 122.35(a)
2. Guidance Document
 - a. Chapter 4.1 Program Management, MS4 Program Evaluation Guidance
3. Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability Audit Specific Tasks
 - a. Develop Key Task and Event Schedule for Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability
 - b. Develop Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability Records Request.
 - c. Conduct meetings per Audit Work Plan, Section 3.
 - d. Notify HDOT Program Manager, EPA and DOH and submit in writing any potential violations identified within two (2) business days after completing of Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability audit.
 - e. Provide HDOT Project Manager with requisite copies (See Audit Work Plan, Section 4.1.2) of draft Audit Report within 45 days after completing of Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability evaluation for each permit.
 - f. HDOT to provide corrections or clarification request to draft Audit Report.
 - g. Incorporate corrections and provide requisite copies (See Audit Work Plan, Section 4.1.3) of final Audit Report within 120 days after completing of Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability evaluation for each permit to DOT Project Manager.
 - h. Lead Auditor and DOT Program Manager to review audit report QC.

4. Template of Key Tasks and Events Schedule

Tasks may be done concurrently or more than one permit may be evaluated by completing a particular task depending on the organization, site location, and/or management of the program.

	Key Task and Events	Tasked	Deadline/ Timeframe	Scheduled Date
1	Contact DOT PM	LA	2 months before briefing	
2	Send Records Request to MS4 PC	LA, HDOT PM	1 month before briefing	
3	Conduct meetings NOTE: Below is a suggested schedule for one example permit			
	Opening briefing Honolulu Harbor	LA	Allotment: 0.5 day	
	Meeting MS4 PC – review records			
	[Schedule for other permits TBD]			
4	Complete Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability audit			
	a. Honolulu/Kalaehoa Harbor Small MS4 Permit	LA	33 months after NTP	
	b. Highways Oahu District MS4 Permit	LA		
	c. Honolulu International Airport Small MS4 Permit	LA		
	d. Highways Maui District Small MS4 Permit	LA		
	e. Kahului Airport Small MS4 Permit	LA		
5	Submit to HDOT PM, EPA and DOH in writing any potential violations identified within two (2) business days of completing evaluation of the Post Construction /Permanent BMP program for a particular permit	LA	2 business days after completing audit	
6	Audit Report Schedule for Staffing, Funding, Organizational Structure, Availability of Resources and Storm Water Program Sustainability			
	Honolulu/Kalaehoa Harbor Small MS4 Draft Report	LA	45 days after 4a	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu/Kalaehoa Harbor Small MS4 Final Report	LA	120 days after 4a	
	Highways Oahu District MS4 Draft Report	LA	45 days after 4b	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Oahu District MS4 Final Report	LA	120 days after 4b	
	Honolulu International Airport Small MS4 Draft Report	LA	45 days after 4c	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Honolulu International Airport Small MS4 Final Report	LA	120 days after 4c	
	Highways Maui District Small MS4 Draft Report	LA	45 days after 4d	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Highways Maui District Small MS4 Final Report	LA	120 days after 4d	
	Kahului Airport Small MS4 Draft Report	LA	45 days after 4e	
	Draft Audit Report comments due to HDOT PM	MS4 PC	25 days after draft report	
	Kahului Airport Small MS4 Final Report	LA	120 days after 4e	
7	Review audit report QC with HDOT PM	LA		

HDOT PM – HDOT Project Manager

LA – Lead Auditor

MS4 PC – MS4 Permit Coordinator

TBD – To be developed